KENNETH S. GOODKIND, ESQUIRE Member of the NJ, NY & PA Bar

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November 12, 2014

Via Electronic Filing

Hon. Esther Salas, U.S.D.J. United States District Court District of New Jersey M. L. King, Jr. Courthouse Room 5076 40 Walnut Street Newark NJ 07102

Re: Jerry K. Wong v. Phelan, Hallinan & Diamond, P.C., et al.

Case No. 2:14-cv-03252-ES-JAD

Extension of Time to Reply in Further Support of Motion to Dismiss

Dear Judge Salas:

This firm represents defendant Phelan, Hallinan & Diamond, P.C. ("PHD"). I have just returned to my office today, having been out of the country since November 1, 2014. On November 3, 2014, plaintiff Jerry K. Wong filed opposition to PHD's Motion to Dismiss. A reply in further support of PHD's Motion is due November 13, 2014. Because I have just returned to the office, I respectfully request that the Court extend the deadline to reply to November 28, 2014. My office has sought the consent of opposing counsel to extend our reply deadline, but they have not yet responded to that request.

Respectfully,

FLASTER/GREENBERG P.C.

/s/ Kenneth S. Goodkind

Kenneth S. Goodkind

cc: Ryan L. Gentile, Esquire (via ecf)